<u>Remarks</u>

Claims 13-20, and 25 are pending in the application. The position set forth in the Office Action has been carefully considered. Reconsideration is respectfully requested.

I. ALLOWABLE SUBJECT MATTER

Applicant acknowledges with appreciation the indicated allowability of claims 16 and 18 subject to being amended to independent form. For at least the reasons set forth below, Applicant believes that all pending claims are in condition for allowance.

II. REJECTIONS OF CLAIMS 13-15, 17, 19-20, AND 25 UNDER 35 U.S.C. § 103

Claims 13-15, 17, 19-20, and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable based on a combination of U.S. Patent No. 4,291,198 (Anderson), U.S. Patent No. 4,668,877 (Kunen), and U.S. Patent No. 5,760,714 (Zimmerman). All pending claims are believed to be allowable for at least the following reasons. Withdrawal of the rejection is respectfully requested.

The inventions defined in independent claims 13-15, 17, 19-20, and 25 are related to a method and computer-readable media for displaying a soft key label. Specifically, independent claim 13 recites "storing a plurality of soft key label sets wherein one of the plurality of the soft key label sets has a function in a particular context and includes a text string." Claim 13 further recites, *inter alia*, "displaying the one of the plurality of the soft key label sets on the display such that the text string corresponds to a physical button on the telephone," and "changing the one of the plurality of the soft key label sets to another of the plurality of the soft key label sets when the context changes." Claim 13 requires, *inter alia*, that "while the one of the plurality of the soft key label sets is being changed, the physical button is deactivated. Independent claim 25 also recites features similar to those of claim 13.

The Office Action cites Anderson as allegedly describing "deactivating." The Anderson patent describes a debouncing function at column 19, lines 35-41. As a preliminary matter, it is respectfully submitted that this debouncing has nothing to do with "deactivating" as claimed. A typical definition of the term "debounce" is as follows (http://www.maxim-ic.com/glossary/index.cfm/Ac/V/ID/82/Tm/Debounce):

> Electrical contacts in mechanical pushbutton switches often make and break contact several times when the button is first pushed. A debouncing circuit removes the resulting ripple signal, and provides a clean transition at its output.

For example, a mechanical key can make and break contact several times such as a series of 0, 1, 0, 1, 0, 1, 1, 1, 1, ... , where 0 denotes an open circuit, and 1 denotes a closed

Appln. No.: 09/480,644   2
Atty Docket: CISCP118/1662

circuit when the key makes transition from 0 to 1. "Debouncing" software (or hardware) receives such fluctuated input from the key, and retrieves only one stabilized state of that key (e.g., "1"). Therefore, as appreciated by those skilled in the art, this debouncing is not equal to deactivating. Since Anderson fails to teach or suggest the claimed deactivation, the claimed invention is patentable over the cited art.

In addition, the Action fails to cite any reference which teaches or suggests the claimed specific *timing* for deactivating the physical button. The Action cites Kunen and Zimmerman as describing the *length* of a time delay. However, it is respectfully submitted that claim 1 requires that "*while* the one of the plurality of the soft key label sets is being changed, the physical button is deactivated." *Timing* of deactivation is recited in the claims, not the *length* of a time delay. Therefore, mere teachings regarding the delay time periods disclosed in Kunen and Zimmerman adds nothing to the teaching of Anderson. Also, it is noted that the Zimmerman patent does not have "column 41-49" (Office Action, page 3, lines 1-2).

Anderson also fails to the claimed timing of the deactivation. Anderson merely describes "the keyboard is debounced *prior to utilization* ... ." However, the cited portions of Anderson do not specify the time period during which this debouncing is performed. At least, this debouncing timing has nothing to do with the claimed time period "*while* the one ... *is being changed.*" Even assuming *arguendo* that debouncing is allegedly equated with the claimed deactivation, Anderson fails to specifically teach the claimed timing of the deactivation.

In summary, nothing in the cited references suggests (i) the claimed deactivation which occurs (ii) at the claimed timing and during the claimed time period. In view of the foregoing, independent claims 13 and 25 are believed to be patentable over the cited art. The Examiner's rejections of the dependent claims are respectfully traversed. However, to expedite prosecution, all of these claims will not be argued separately. Other claims each depend either directly or indirectly from independent claims 13 and 25, and therefore, are respectfully submitted to be patentable over cited art for at least the reasons set forth above with respect to claims 13 and 25.

Appln. No.: 09/480,644   3
Atty Docket: CISCP118/1662

II.   CONCLUSION

Applicant believes that all pending claims are in condition for allowance, and respectfully requests a Notice of Allowance at an early date. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 510-663-1100, ext. 245.

Respectfully submitted,
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Appln. No.: 09/480,644   4
Atty Docket: CISCP118/1662